25349



D. REECE WILLIAMS, III, ESQ.
ReeceWilliams@callisontighe.com

April 24, 2014

The Honorable Jocelyn Boyd Chief Clerk/Administrator Public Service Commission of South Carolina P.O. Drawer 11649 Columbia, SC 29211

RE: Application of Palmetto Wastewater Reclamation, LLC d/b/a Alpine

Utilities and d/b/a Woodland Utilities for Adjustment of Rates

and Charges for Sewer Service

Docket No. 2014-69-S Our File No. 5999.002

Dear Ms. Boyd:

Enclosed please find for filing the original and two (2) copies of the Notice of Appearance, Petition to Intervene and Protest and Certificate of Service, being filed on behalf of Arch Enterprises, LLC d/b/a McDonalds, in regard to the above-referenced matter. Kindly acknowledge your receipt by clocking the extra copies that are enclosed and returning same to me in the envelope provided for your convenience.

If you should have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

CALLISON TIGHE & ROBINSON, LLC

Reece Williams, III

DRW:kam Enclosures

cc: (w/ encl.) Jeffrey Nelson Office Color OS

John M.S. Hoefer, Esquire

G:\5000\5999.002\Palmetto Wastewater Reclamation, LLC Docket No. 2014-69-S\PSC Clerk.001.wpd

## **BEFORE**

## THE PUBLIC SERVICE COMMISSION OF

## SOUTH CAROLINA

DOCKET NO. 2014 60 S

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IN RE:  Application of Palmetto Wastewater Reclamation, LLC d/b/a Alpine Utilities and d/b/a Woodland Utilities for adjustment of rates and charges for, and the modification of certain terms and conditions	) ) NOTICE OF APPEARANCE ) )	う。 では で の で で の で の で の で の で の で の で の の で の の の の の の の の の の の の の	14 APR 25 08 1:56	ACTIVITY OF
related to, the provision of sewer service.	)			
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YOU WILL PLEASE TAKE NOTICE that D. Reece Williams, III, Esquire and Kathleen M. McDaniel, Esquire, hereby gives notice of their appearance as counsel for Intervenor/Petitioner, Arch Enterprises, LLC d/b/a McDonalds, in the above-captioned matter. Please serve all pleadings, motions, correspondence, notices and related papers to the undersigned as counsel for Intervenor/Petitioner.

MECENTEL BIHAPK 25 PM 1:55 SORUBINGERMOE CALLISON TIGHE & ROBINSON, LLC

D. Reece Williams, III Kathleen M. McDaniel 1812 Lincoln Street, Suite 100 P.O. Box 1390

Columbia SC 29202 Tel. (803) 404-6900

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Attorney for Petitioner Arch Enterprises, LLC d/b/a McDonalds

April 24, 2014 Columbia, South Carolina

#### **BEFORE**

## THE PUBLIC SERVICE COMMISSION OF

## SOUTH CAROLINA

DOCKET NO. 2014-69-S

IN RE:	)	
Application of Palmetto Wastewater Reclamation, LLC d/b/a Alpine Utilities and d/b/a Woodland Utilities for adjustm of rates and charges for, and the modification of certain terms and conditirelated to, the provision of sewer service.	) ons )	PETITION TO INTERVENE AND PROTEST

The Petitioner, Arch Enterprises, LLC d/b/a McDonalds, by and through its undersigned counsel, would show this Commission the following:

- 1. This is a Petition to Intervene submitted pursuant to S.C. Code Regs. 103-825 (3) and a Protest submitted pursuant to S.C. Code Regs. 103-827.
- 2. The Petitioner, Arch Enterprises, LLC d/b/a McDonalds, is a corporation organized and existing under the laws of the State of South Carolina and doing business in Richland County.
- 3. The Petitioner is a customer of the Applicant, Palmetto Wastewater Reclamation, LLC d/b/a Alpine Utilities, and owns commercial property served by the Applicant.
- 4. The Petitioner is directly affected by this proposed rate increase in that the Petitioner is a significant user of the Applicant's services and should, therefore, be permitted to intervene.
- 5. The Petitioner protests the proposed rate increase because it appears to be arbitrary and capricious and will likely result in an exorbitant rate increase as applied to the Petitioner.
  - 6. The Petitioner further requests that this Commission grant it leave to intervene and

participate in all proceedings on this docket, including notice of all further matters involving this proceeding. The Petitioner expects its presentation to require approximately one hour.

Wherefore, the Petitioner respectfully requests the above-mentioned relief and any other and further relief that this Commission may deem just and proper.

CALLISON TIGHE & RØBYNSON, LLC

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kathleenmcdaniel@callisontighe.com

Attorney for Petitioner Arch Enterprises, LLC d/b/a McDonalds

April 24, 2014 Columbia, South Carolina

## **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF

## SOUTH CAROLINA

DOCKET NO. 2014-69-S

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	)	
•	)	

I, Katie A. Minton, an employee of Callison Tighe & Robinson LLC, Attorneys for the Petitioner, do hereby certify that I have served a copy of the **NOTICE OF APPEARANCE AND PETITION TO INTERVENE AND PROTEST** in this matter on the following parties by causing copies to be placed in the United States Mail, first-class postage affixed, addressed as follows, on April 24, 2014:

Jeffrey Nelson, Esquire S. C. Office of Regulatory Staff 1401 Main Street Suite 900 Columbia, SC 29201

John M. S. Hoefer, Esquire Willoughby & Hoefer, P.A. P.O. Box 8416 Columbia, SC 29202

April 24, 2014 Columbia, South Carolina KATIE A. MINTON